

# **EXHIBIT 4**

1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE NORTHERN DISTRICT OF ILLINOIS  
2           EASTERN DIVISION

3    )  
4           CHRISTOPHER HOWE,                              )  
4           individually, and on behalf                 )  
5           of all others similarly                        )  
5           situated,                                        )  
6    )  
6           Plaintiff,                                      )  
7    )  
7           -vs-    ) No. 1:19-cv-01374  
8    )  
8           SPEEDWAY, LLC,                                 )  
9    )  
9           Defendants.                                    )

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11    The remote discovery deposition of  
12    KOSTAS MALLIAS, called as a witness for  
13    examination, taken before MICHELLE M. YOHLER,  
14    Certified Shorthand Reporter for the State of  
15    Illinois, CSR No. 84-4531, appearing remotely in  
16    Will County, Illinois, on July 15, 2020, at  
17    10:35 a.m.

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1                           KOSTAS MALLIAS,  
2   called as a witness herein, having been first  
3   duly sworn, was examined and testified as  
4   follows:

5                           EXAMINATION

6   BY MR. STEPHAN:

7       Q.    Kostas, can you please state and  
8   spell your full name on the record for us.

9       A.    Sure. It's Kostas, K-o-s-t-a-s,  
10   Mallias, M-a-l-l-i-a-s.

11      Q.    Good morning again, Kostas. We had a  
12   chance briefly to say hello before we began  
13   today.

14                  Is it okay if I call you by your  
15   first name?

16      A.    Yes.

17      Q.    Thank you.

18                  Have you ever been deposed before?

19      A.    No.

20      Q.    I'm going to go over a couple ground  
21   rules. And things may be a little bit different  
22   today because we are taking this remotely via  
23   Zoom, but generally I think that the ground  
24   rules still apply.

1 this litigation?

2 A. No.

3 Q. So going back to your work with  
4 Kronos, correct me if I'm wrong, but I think you  
5 mentioned you started there back in 2013?

6 A. Yeah. I worked for a company called  
7 TimeLink, and we were acquired by Kronos in  
8 2013.

9 Q. When did you start at TimeLink?

10 A. 2007.

11 Q. And what does TimeLink do or what did  
12 TimeLink do?

13 A. Similar to Kronos. We had software  
14 that managed and tracked employees' time.

15 Q. For payroll purposes?

16 A. Yes.

17 Q. Did TimeLink also have hardware, or  
18 was it software only?

19 A. Both hardware and software.

20 Q. And when you started at TimeLink,  
21 what was your position?

22 A. I was a manager.

23 Q. How long did you hold that position?

24 A. About three or four years, and then I